

August 12, 1997

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE CHAIRMAN

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: CC Docket Nos. 96-45, 97-21 — Nomination for Universal Service  
Administrative Company Board — Low-Income Consumer Representative

Dear Chairman Hundt:

I am the Executive Director of the Texas Legal Services Center, a not-for-profit organization representing low-income persons in the state of Texas. I am writing to nominate B. Robert Piller as a candidate for appointment to be one of the directors of the Universal Service Administrative Company ("USAC") representing low-income consumers.

As the enclosed biography shows, Bob Piller is Executive Director of the Public Utility Law Project of New York, Inc. ("PULP"), a not-for-profit organization representing the interests of low-income consumers in telecommunications, energy and utility matters. He recently served in an advisory capacity to the Federal - State Universal Service Joint Board on a committee concerned with rural health care, and participates on a New York Diffusion Fund committee, helping to develop and implement advanced telecommunications projects in disadvantaged areas.

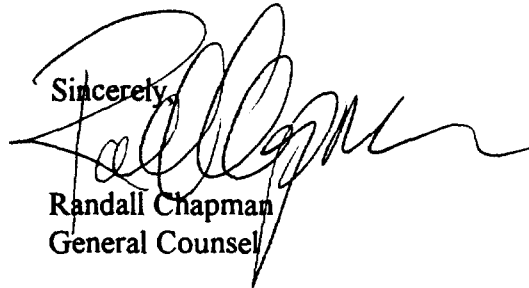
Bob Piller is a highly talented advocate for low-income customers and is a skilled negotiator. As a result of his work and leadership, New York has implemented major improvements in its telephone Lifeline and Linkup programs -- including the automated enrollment of customers eligible for Lifeline. Also, Bob has worked to improve telephone fair practices rules, and billing and collection rules. He is quite familiar with the administrative challenges of integrating Lifeline programs in the new competitive multi-provider structure. In Texas, we have worked with PUC staff to review his recommendations on universal service. Recently drafted PUC regulations reflect his expertise and assistance in this area.

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In sum, Bob Piller has a record of major accomplishments in striving for telecommunications services for low-income persons. He is widely respected across the country for his dedication and the accomplishments of PULP under his leadership. Accordingly, I urge that you appoint him to be a director of the Universal Service Administrative Company.

Thank you for your consideration.

Sincerely,  
  
Randall Chapman  
General Counsel

Encl. Biography

cc: William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, DC 20554

**B. Robert Piller - Biography  
for Nomination to be a Director of the  
Universal Service Administrative Company**

B. Robert Piller has served as Director and General Counsel of the Public Utility Law Project of New York, Inc. (PULP) since 1978. PULP is nationally recognized as a spirited and effective advocate for low-income consumers in the courts, regulatory agencies, and the state legislature. PULP was an active contributor in numerous cases concerning the introduction of performance regulation and competition for the telecommunications industry in New York. In the course of that effort, Mr. Piller served as a member of the "Governor's Telecommunications Exchange" and its Regulatory Options Task Force. Since then Mr. Piller worked to implement a PULP initiative which utilizes a computerized list exchange process to enroll participants in the Telephone Lifeline discount rate program for low-income customers. As of July 1, 1997, this unique effort enabled New York Telephone to enroll nearly 3/4 of a million eligible low-income households in the Lifeline rate assistance program. Currently Mr. Piller serves as Vice-Chair of a "Diffusion Fund" Committee, established by the NYNEX Performance Based Ratemaking Agreement, and he is developing initiatives to bring the benefits of advanced telecommunications to economically disadvantaged communities. PULP is currently emphasizing the introduction of advanced telecommunications in the homes of low-income K-12 students and at low-income senior citizen residential homes. Also, PULP is actively engaged in the debate about the introduction of competition in the electric utility industry, with particular emphasis on affordable service and consumer protections for low-income households.

Previously Mr. Piller worked with the Harlem Office of the Legal Aid Society's Civil Division and with MFY Legal Services in New York City's Lower East Side. A graduate of Brooklyn College and Brooklyn Law School, Mr. Piller has taught law school courses on Regulated Industries and Administrative Law.